

28 DEC 2004

Mr. John Arbuthnot  
Safety-Kleen Corporation  
P.O. Box 74137  
Baton Rouge, Louisiana 70874-4137

RE: Scope of Work for Limited Delineation and Verification Soil Sampling and Monitoring  
Well Installation  
Clean Harbors Kansas, LLC  
EPA I.D. # KSD007246846

Dear Mr Arbuthnot:

The Environmental Protection Agency (EPA) has completed a review of the above referenced document, dated November 23, 2004. Prior to implementation of the additional soil sampling and monitoring well installation described in the document, please address the following issues:

1. The scope of work must include a statement specifying that the additional field activities will be performed in accordance with procedures in the approved Quality Assurance Project Plan and RFI Work Plan.
2. Encore® is an acceptable sampling option according to EPA Method 5035; however, this is not the only or most cost-effective means to satisfy the method requirements. Some comparative studies suggest using a cut-off syringe to collect a subsample "plug" yields slightly higher concentrations of VOCs in soils than Encore®. Collection of the "plug" is followed by sample preservation with either methanol or HCL-preserved de-ionized distilled water and laboratory extraction through the septa of the 40-ml VOA vial. The cut-off syringe method is also cheaper than Encore®. CHK may choose to utilize whichever method it is most comfortable with implementing in the field.
3. EPA requests the following additional soil samples be obtained during this soil sampling event:
  - A. Additional VOC verification samples from the Solids Gondola area to demonstrate correlation with some of the higher VOC results obtained on-site.
  - B. One sample to verify results of the data from B-70 or B-99. These samples were collected outside the fenceline; additional samples should be completed for the purpose of ensuring that there are no uncontrolled exposures.

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GOTTO *LG*  
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RCRA RECORDS

4. Please include a specification of the screen length projected for the three proposed monitoring wells along with a statement indicating screen intervals will be based on the observed VOC stratification. In addition, please ensure the screen intervals are reported as elevations.

Please provide a revised scope of work which addresses the comments listed above for EPA approval prior to implementation of the additional RFI field work. If you have any questions about the contents of this letter, please do not hesitate to contact me at (913) 551-7210.

Sincerely,

Lisa A. Gotto  
Project Manager

cc: John Cook  
KDHE/BER  
Brian C. Martinek  
Cameron-Cole

ARTD/RCAP:cas:h/LGOTTO/RFIWPADDENDUM.DOC/122804